

**REMARKS**

By this amendment, claims 11-15 have been amended. Claims 11-15 are currently pending in the application, of which claims 11 and 15 are independent claims. The Office Action indicates that claim 14 is objected to but would be allowable if presented in independent form.

Entry of this Amendment is respectfully requested because it places the present application in condition for allowance, or in the alternative, better form for appeal. In view of the above Amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

***Rejections Under 35 U.S.C. §103***

Claims 11, 12 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 5,691,786 issued to Nakai ("Nakai") in view of Applicant's Admitted Prior Art ("AAPA"). Applicant respectfully traverses this rejection for at least the following reasons.

With respect to claims 11 and 12, in this response, independent claim 11 has been amended to recite as follows:

“1. A liquid crystal display (LCD), comprising:  
...  
a pixel electrode ... *entirely covering a portion of the storage capacitance electrode;*  
...  
a common electrode formed on the second substrate and having *a first opening pattern overlapping the portion of the storage electrode entirely covered by the pixel electrode.*”

An example of these features is shown in Fig. 2 of the present application, in which the pixel electrode 50 entirely covers a portion of the storage capacitor electrode 24. Also, the

opening pattern 81 of the common electrode overlaps the portion of the storage electrode 24 entirely covered by the pixel electrode 50.

In this regard, Nakai discloses the pixel electrode 86 entirely covering the second branch 83b of the storage capacitance line 83. However, Nakai fails to disclose or even remotely suggest “a common electrode formed on the second substrate and having *a first opening pattern overlapping the portion of the storage electrode entirely covered by the pixel electrode*”, as recited in claim 11.

AAPA fails to disclose “a pixel electrode ... *entirely covering a portion of the storage capacitance electrode*”. Thus, AAPA would not be able to disclose or suggest “a common electrode formed on the second substrate and having *a first opening pattern overlapping the portion of the storage electrode entirely covered by the pixel electrode*”.

Since none of the cited references discloses or suggests these claimed features, it is submitted that claim 11 is patentable over them. Claim 12 that is dependent from claim 11 would be also patentable at least for the same reason.

Independent claim 15 has been amended to recite “a pixel electrode ... entirely covering a portion of the branch portion; and a common electrode ... having an opening pattern overlapping the portion of the branch portion entirely covered by the pixel electrode”. As previously mentioned, none of the cited references discloses or suggests these features. Thus, it is submitted that claim 15 is also patentable over them.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claims 11, 12 and 15.

Claim 13 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Nakai in view of AAPA and further in view of United States Patent No. 6,252,643 issued to Song (“Song”). Applicant respectfully traverses this rejection for at least the following reasons.

Claim 13 is dependent from claim 11. As previously mentioned, claim 11 has been amended and is now believed to be patentable over Nakai and AAPA because, for example, none of them discloses or suggests “a common electrode formed on the second substrate and having *a first opening pattern overlapping the portion of the storage electrode entirely covered by the pixel electrode*”, as recited in claim 11.

Song is directed to a single common line extending along the substrate edge but does not disclose or suggest “a common electrode formed on the second substrate and having *a first opening pattern overlapping the portion of the storage electrode entirely covered by the pixel electrode*”. Since none of the cited references discloses or suggests this claimed feature, it is submitted that claim 11 is patentable over them. Claim 13 that is dependent from claim 11 would be also patentable at least for the same reason.

Also, the common line 100 described in column 8, lines 33-50 of Song is formed outside of the pixel region, and hence, does not satisfy “the storage capacitor line comprises two lines *in the pixel region*” as recited in claim 13.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claim 13.

***Other Matters***

In addition to the amendments mentioned above, claims 11-15 have been amended for better wording and clarification purposes only. Also, certain limitations that appear not to be necessary for patentability issues have been deleted.

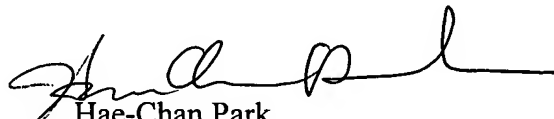
**CONCLUSION**

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

  
Hae-Chan Park  
Reg. No. 50,114

Date: November 19, 2004

**McGuireWoods LLP**  
1750 Tysons Boulevard  
Suite 1800  
McLean, VA 22102-4215  
Tel: 703-712-5365  
Fax: 703-712-5280  
HCP:WSC/tmk

\\COM\457841.1